UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NORTH CAROLINA ASHEVILLE DIVISION UNITED STATES DISTRICT COURT JUN 0 W. DISTRICT W. DISTRICT W. DISTRICT ON THE WESTERN DISTRICT COURT ASHEVILLE DIVISION

ASHEVILLE, NC

JUN 0 4 2024
S. DISTRICT COURT

UNITED STATES OF AMERICA

DOCKET NO. 1:24CR 32-Moc-wcm

BILL OF INDICTMENT

v.

Violations:

WILLIAM PERCELL WATKINS

21 U.S.C. § 841(a)(1) 18 U.S.C. § 922(g)(1) 18 U.S.C. § 924(c)

THE GRAND JURY CHARGES:

COUNT ONE

On or about January 7, 2024, in Buncombe County, within the Western District of North Carolina and elsewhere, the defendant,

WILLIAM PERCELL WATKINS

did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable quantity of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT TWO

On or about January 7, 2024, in Buncombe County, within the Western District of North Carolina and elsewhere, the defendant,

WILLIAM PERCELL WATKINS

knowing that he had previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm and ammunition in and affecting commerce, that being a Hi-Point, model C9, 9mm caliber pistol, and sixteen rounds of 9mm caliber ammunition, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT THREE

On or about January 7, 2024, in Buncombe County, within the Western District of North Carolina and elsewhere, the defendant,

WILLIAM PERCELL WATKINS

in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that being possession with intent to distribute a controlled substance, did knowingly possess a firearm, that being a Hi-Point, model C9, 9mm caliber pistol, in violation of Title 18, United States Code, Section 924(c)(1)(A).

NOTICE OF FORFEITURE AND FINDING OF PROBABLE CAUSE

Notice is hereby given of 21 U.S.C. § 853, 18 U.S.C. § 924, and 28 U.S.C. § 2461(c). The following property is subject to forfeiture in accordance with Section 853, 924 and/or Section 2461(c):

- a. All property which constitutes or is derived from proceeds of the violations set forth in this bill of indictment;
- b. All property used or intended to be used in any manner or part to commit or facilitate such violations;
- c. All firearms or ammunition involved or used in such violations; and
- d. If, as set forth in 21 U.S.C. § 853(p), any property described in (a), (b), or (c) cannot be located upon the exercise of due diligence, has been transferred or sold to, or deposited with, a third party, has been placed beyond the jurisdiction of the court, has been substantially diminished in value, or has been commingled with other property which cannot be divided without difficulty, all other property of the defendant/s to the extent of the value of the property described in (a), (b), and (c).

The Grand Jury finds probable cause to believe that the following property seized during the course of the investigation is subject to forfeiture on one or more of the grounds stated above:

- 1. One (1) Hi-Point, model C9, 9mm caliber pistol; and
- 2. Sixteen rounds of 9mm caliber ammunition.

A TRUE BILL:

GRAND JURY FOREPERSON

DENA J. KING

UNITED STATES ATTORNEY

ANNABELLE CHAMBERS

SPECIAL ASSISTANT UNITED STATES ATTORNEY